

FEB 1 2022

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

| | | |
|-------------------------------|---|----------------------------------|
| UNITED STATES OF AMERICA |) | DOCKET NO. 1:22CR1-MR-WCM |
| |) | |
| v. |) | <u>BILL OF INDICTMENT</u> |
| |) | |
| (1)ALEXA RAE BASSILLO |) | Violations: |
| (2)BERNARD EUGENE CARSON, JR. |) | 18 U.S.C. § 2 |
| (3)LYRON DESHAWN GREENLEE |) | 18 U.S.C. § 371 |
| (4)JESSE LYNN WILLIAMS |) | 18 U.S.C. § 922(g)(1) |
| |) | 18 U.S.C. § 922(g)(3) |
| |) | 18 U.S.C. § 922(u) |
| |) | |

THE GRAND JURY CHARGES:

COUNT ONE

On or about January 7, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere, the defendants,

**(1)ALEXA RAE BASSILLO
(3)LYRON DESHAWN GREENLEE
(4)JESSE LYNN WILLIAMS**

did knowingly combine, conspire, confederate, and agree with each other, and with other persons both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to unlawfully take and carry away from the person and the premises of a person who is licensed to engage in the business of importing, manufacturing, and dealing in firearms, firearms in the licensee's business inventory that had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(u).

OBJECT OF THE CONSPIRACY

It was a part and an object of the conspiracy for the defendants, and other persons both known and unknown to the Grand Jury, to break into Carolina Guns and Gear West, LLC, doing business as Carolina Guns and Gear, a federal firearms licensee, located at 3106 Sweeten Creek Road, Suite D, Asheville, North Carolina, and steal, take, and carry away firearms.

OVERT ACTS

In furtherance of this conspiracy and to affect the objectives thereof, at least one of the co-conspirators committed at least one of the following overt acts, among others, in the Western District of North Carolina:

On or about January 7, 2022:

- a. WILLIAMS drove to Carolina Guns and Gear located at 3106 Sweeten Creek Road, Suite D, Asheville, North Carolina.
- b. BASSILLO drove GREENLEE, and others, to locations near Carolina Guns and Gear where BASSILLO knew that GREENLEE and others planned to serve as lookouts during the break-in of Carolina Guns and Gear.
- c. GREENLEE and others served as lookouts during the break-in of Carolina Guns and Gear.
- d. WILLIAMS did break and enter Carolina Guns and Gear and stole thirty-four (34) firearms, but dropped one firearm, which was left at the scene, taking away thirty-three (33) firearms with him.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

On or about January 7, 2022, in Buncombe County, within the Western District of North Carolina, the defendants,

- (1) ALEXA RAE BASSILLO**
- (3) LYRON DESHAWN GREENLEE**
- (4) JESSE LYNN WILLIAMS**

did knowingly steal and unlawfully take and carry away from the premises of a person who is licensed to engage in the business of importing, manufacturing, and dealing in firearms, to wit: Carolina Guns and Gear West, LLC, doing business as Carolina Guns and Gear, Asheville, North Carolina, multiple firearms in the licensee's business inventory, all of which were shipped and transported in interstate and foreign commerce, and did aid and abet each other and others known and unknown to the Grand Jury.

All in violation of Title 18, United States Code, Sections 922(u) and 2.

COUNT THREE

From between on or about January 7, 2022, through on or about January 10, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere,

- (4) JESSE LYNN WILLIAMS**

knowing that he had been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess firearms, in and affecting commerce, those being:

1. A CZ USA, 75 Compact, 9mm pistol.
2. A CZ USA, P10C, 9mm pistol.
3. A CZ USA, 75B, 9mm pistol.
4. An RIA Armscor Int'l, XTM 22, .22 caliber pistol.
5. A KelTec, CP 33, .22 caliber pistol.
6. A Shadow Systems, XR 920, 9mm pistol.
7. A Shadow Systems, XR 920, 9mm pistol.
8. A Taurus Int'l, TX22, .22 caliber pistol.
9. A Taurus Int'l, G3, 9mm pistol.

10. A Beretta, APX RDO, 9mm pistol.
11. A Beretta, PX4 Storm, 9mm pistol.
12. An IWI LTD, Jericho, 9mm pistol.
13. An IWI LTD, Masada, 9mm pistol.
14. An IWI LTD, Masada, 9mm pistol.
15. A Walther/Colt, 1911 A1, .22 caliber pistol.
16. A Walther/Colt, 1911 A1, .22 caliber pistol.
17. A Walther, Creed, 9mm pistol.
18. A Walther, PPQ M2, .22 caliber pistol.
19. A Walther, PP 22, .22 caliber pistol.
20. A Walther, PDP SS, 9mm pistol.
21. A Smith and Wesson, M&P 45, .45 caliber pistol.
22. A Smith and Wesson, M&P 9, 9mm pistol.
23. A Smith and Wesson, M&P 22 Compact, .22 caliber pistol.
24. A Springfield Armory, XD 9 Defender, 9mm pistol.
25. A Springfield Armory, XD-M Elite, 9mm pistol.
26. A Springfield Armory, XD-M Elite, 9mm pistol.
27. A Ruger, SR 22 P, .22 caliber pistol.
28. A Ruger, SR 22 P, .22 caliber pistol.
29. A Canik, TP 9 Elite SC, 9mm pistol.
30. A Canik, TP 9 SF Elite, 9mm pistol.
31. A Canik, TP 9 Elite, 9mm pistol.
32. A Canik, METE SFX, 9mm pistol.
33. A Glock, 44, .22 caliber pistol.
34. An FIE Corp., Titan, .25 caliber pistol.
35. A CZ USA, CZ912, 12 gauge shotgun.
36. A Norinco, SKS, 7.62x39 caliber rifle.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

From between on or about January 7, 2022, through on or about January 10, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere,

(4) JESSE LYNN WILLIAMS

knowing that he was an unlawful user of and addicted to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. Section 802)), did knowingly and unlawfully possess firearms, in and affecting commerce, those being:

1. A CZ USA, 75 Compact, 9mm pistol.
2. A CZ USA, P10C, 9mm pistol.
3. A CZ USA, 75B, 9mm pistol.
4. An RIA Armscor Int'l, XTM 22, .22 caliber pistol.
5. A KelTec, CP 33, .22 caliber pistol.
6. A Shadow Systems, XR 920, 9mm pistol.
7. A Shadow Systems, XR 920, 9mm pistol.
8. A Taurus Int'l, TX22, .22 caliber pistol.
9. A Taurus Int'l, G3, 9mm pistol.
10. A Beretta, APX RDO, 9mm pistol.
11. A Beretta, PX4 Storm, 9mm pistol.
12. An IWI LTD, Jericho, 9mm pistol.
13. An IWI LTD, Masada, 9mm pistol.
14. An IWI LTD, Masada, 9mm pistol.
15. A Walther/Colt, 1911 A1, .22 caliber pistol.
16. A Walther/Colt, 1911 A1, .22 caliber pistol.
17. A Walther, Creed, 9mm pistol.
18. A Walther, PPQ M2, .22 caliber pistol.
19. A Walther, PP 22, .22 caliber pistol.
20. A Walther, PDP SS, 9mm pistol.
21. A Smith and Wesson, M&P 45, .45 caliber pistol.
22. A Smith and Wesson, M&P 9, 9mm pistol.
23. A Smith and Wesson, M&P 22 Compact, .22 caliber pistol.
24. A Springfield Armory, XD 9 Defender, 9mm pistol.
25. A Springfield Armory, XD-M Elite, 9mm pistol.
26. A Springfield Armory, XD-M Elite, 9mm pistol.
27. A Ruger, SR 22 P, .22 caliber pistol.

28. A Ruger, SR 22 P, .22 caliber pistol.
29. A Canik, TP 9 Elite SC, 9mm pistol.
30. A Canik, TP 9 SF Elite, 9mm pistol.
31. A Canik, TP 9 Elite, 9mm pistol.
32. A Canik, METE SFX, 9mm pistol.
33. A Glock, 44, .22 caliber pistol.
34. An FIE Corp., Titan, .25 caliber pistol.
35. A CZ USA, CZ912, 12 gauge shotgun.
36. A Norinco, SKS, 7.62x39 caliber rifle.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT FIVE

On or about January 10, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere,

(1) ALEXA RAE BASSILLO

knowing that she was an unlawful user of and addicted to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. Section 802)), did knowingly and unlawfully possess firearms, in and affecting commerce, those being:

1. A Diamondback Firearms, DB9, 9mm pistol.
2. A Norinco, SKS, 7.62 x 39 caliber rifle.
3. A CZ USA, CZ912, 12 gauge shotgun.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT SIX

From between on or about January 7, 2022, through on or about January 10, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere,

(3) LYRON DESHAWN GREENLEE

knowing that he had been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess firearms, in and affecting commerce, those being:

1. A Springfield Armory, XD 9 Defender, 9mm pistol.
2. A Springfield Armory, XD-M Elite, 9mm pistol.
3. A Smith and Wesson, M&P 45, .45 caliber pistol.
4. A Smith and Wesson, M&P 9, 9mm pistol.
5. A Beretta, PX4 Storm, 9mm pistol.
6. A Shadow Systems, MR920, 9mm pistol.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

From between on or about January 7, 2022, through on or about January 12, 2022, in Buncombe County, within the Western District of North Carolina, and elsewhere,

(2) BERNARD EUGENE CARSON, JR.

knowing that he had been previously convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly and unlawfully possess a firearm, in and affecting commerce, that being, a Smith and Wesson, M&P 9, 9mm pistol.

All in violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given of 18 U.S.C. § 924 and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 924 and/or Section 2461(c): all firearms and ammunition involved or used in the violation set forth in this Bill of Indictment.

The Grand Jury finds probable cause to believe that the following property is subject to forfeiture on one or more of the grounds stated above:

1. An FIE Corp., Titan, .25 caliber pistol.
2. A CZ USA, CZ912, 12 gauge shotgun.
3. A Norinco, SKS, 7.62x39 caliber rifle.
4. Various assorted ammunition.

REDACTED

DENA J. KING
UNITED STATES ATTORNEY



DAVID A. THORNELOE
ASSISTANT UNITED STATES ATTORNEY